

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

*

VS

*

NO. 03-CR-10385-RGS

*

KIRK RINALDI

*

MOTION FOR PRE-PLEA PRESENTENCE REPORT

The defendant moves that the court authorize the Probation Office to prepare a Pre-Plea Presentence Report, without his being personally interviewed, and that the same be based solely on information available to probation from defendant's record and the subject matter of this case. This request is made in order to provide the defendant with sufficient knowledge to consider concluding this case without the need of a trial on the merits.

June 21, 2006

/s/ Karnig Boyajian
Karnig Boyajian (BBO#052080)
Defendant's Attorney
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Newton, MA 02458
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CERTIFICATE

I hereby certify a copy of the within motion was this date delivered, faxed and/or mailed postage prepaid to AUSA Christopher Bator, c/o U.S. Attorney's Office, One Courthouse Way, Suite 9200, Boston, MA, 02110.

June 21, 2006

/s/ Karnig Boyajian
Karnig Boyajian